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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

KHUSHBOO PUNEET,

Plaintiff,

v.

UR JADDOU, Director, United States
Citizenship and Immigration Services,

Defendant.

5:22-cv-01803-NC

**STIPULATION TO DISMISS;
ORDER**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), the parties, through their undersigned attorneys, stipulate to dismiss this action on the following terms:

1. Defendant acting on behalf of the United States Citizenship and Immigration Services (“USCIS”) agrees to take adjudicative action—approve, deny, or issue a request for evidence—on Plaintiff’s application for H-4 status (WAC2204150770) and work authorization (WAC2204150804), and to do so by April 30, 2022. If USCIS issues a Request for Evidence (“RFE”) or Notice of Intent to Deny (“NOID”) for either petition, USCIS will take the next adjudicative action within 30 days from receipt of each response.

2. If Plaintiff believes there is a breach of this agreement, Plaintiff agrees to give USCIS’s counsel notice and seven days to remedy such breach prior to seeking judicial intervention.

3. If Defendant is unable to meet these deadlines for reasons out of its control, she agrees to notify counsel for Plaintiff, and the parties agree to work in good faith to resolve the issue prior to judicial intervention.

4. The parties agree to bear their own costs and fees. In accordance with Civil Local Rule 5(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

Dated: April 4, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/ Benjamin J. Wolinsky
BENJAMIN J. WOLINSKY
Assistant United States Attorney
Attorneys for Defendant

Dated: April 4, 2022

/s/ Bernard P. Wolfsdorf
BERNARD PAVEL WOLFSDORF
Attorney for Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: April 5, 2022

